

SECOR INTERNATIONAL INCORPORATED www.secor.com

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June 10, 2005

Project #08CH.51834.05

Mr. Kent Huth
County of San Diego
Department of Environmental Health (DEH)
Land and Water Quality Division (LWQD)
Site Assessment and Mitigation (SAM) Program
P.O. Box 129261
San Diego, CA 92112-9261

Subject:

Work Plan for Confirmation Borings

Former Chevron Service Station #9-1834

4175 Voltaire Street

San Diego, California 92107

Unauthorized Release # H12455-001

Dear Mr. Huth:

On behalf of Chevron Environmental Management Company (Chevron), SECOR International Incorporated (SECOR) is submitting this work plan to install confirmation borings at the subject site (Figures 1 and 2; the Site). This work is being proposed in compliance with the *Response Letter* from the SAM, dated May 11, 2005, which was issued in response to SECOR's March 7, 2005 *Notice of Remediation System Shut-Down and Site Closure Evaluation* (Attachment 1). In this letter, SAM required that confirmation borings be installed while the soil vapor extraction (SVE) system is shut down to evaluate remedial system effectiveness. The SVE system shutdown was proposed in SECOR's April 11, 2002 *Work Plan for Interim Remediation*. The proposed activities include the installation of five confirmation borings to assess the extent of residual hydrocarbon impacts remaining at the Site. Key gasoline indicator chemicals, including total petroleum hydrocarbons as gasoline (TPHg), total recoverable petroleum hydrocarbons (TRPH), benzene, toluene, ethylbenzene, xylenes (BTEX), and methyl-tert-butyl ether (MtBE), will be analyzed for.

SITE BACKGROUND

Site Description

Former Chevron Service Station #9-1834 is currently an unpaved vacant lot located on the southern corner of Voltaire Street and Catalina Boulevard in San Diego, California (Figure 2). The Site is located on a peninsula approximately 1.25-miles east of the Pacific Ocean, approximately 0.8-miles south of the San Diego River Floodway, and approximately 1.5-miles northwest of San Diego Bay. The SVE remediation system is located within a chain-link fence enclosure near the south edge of the Site. Aboveground piping extends from the enclosure to six SVE wells.

Hydrostratigraphic Setting

The Site lies along the border of the Pleistocene-age Linda Vista and Bay Point Formations. The Linda Vista Formation consists of near-shore marine and non-marine sediments, mostly comprised of moderate reddish-brown interbedded sandstone and conglomerate. The Bay Point Formation is composed mainly of marine and non-marine, poorly consolidated, pale brown, fine and medium grained fossilferous sandstone (Kennedy, Reprint 2001). A review of the quadrangle, dated 1967 and photorevised in 1975, with minor revision in 1994, U.S. Geological Survey (USGS) Point Loma, California 7.5-minute topographic map indicates that the Site vicinity lies at an elevation of approximately 70 feet above mean sea level (MSL).

The lithology encountered beneath the Site was primarily comprised of silty sands. Underlying the silty sand along the northeast side of the Site (near Voltaire Street), were clayey silts at depths of 20 to 24 feet below ground surface (bgs). The clayey silt layer ranged in thickness from approximately 5 to 14 feet. Near the north corner of the Site, the clayey silt layer was underlain by poorly graded sands. Near the west side of the Site, well graded sands were encountered beneath the silty sand, at depths ranging from approximately 25 to 45 feet bgs.

Water Quality Control Plan for the San Diego Basin (9), published by the California Regional Water Quality Control Board (RWQCB), indicates that the Site lies within the Mission San Diego Hydrologic Sub Area (HSA 907.11) of the Lower San Diego Hydrologic Area (HA 907.10) of the San Diego Hydrologic Unit (HU 907.00). Groundwater within this HSA is currently designated as beneficial for agricultural supply, industrial process supply, and industrial service supply uses. Groundwater in the Mission San Diego HSA has potential beneficial use for municipal and domestic supply; however, the potential beneficial use does not apply to areas west of Interstate Highway 5. Therefore, groundwater beneath the Site is exempted from the RWQCB's sources of drinking water policy (RWQCB, 1994). Based on a review of a map prepared by the San Diego County Water Quality Authority (SDCWA), the Site is not located within a sensitive aquifer boundary (SDCWA, 1996).

Historic groundwater measurements indicate that groundwater has fluctuated between approximately 49 to 53 feet bgs at the Site. According to the most recent Quarterly Groundwater Monitoring Report (Third & Fourth Quarter 2004), the depth-to-static-water (DTW) ranged from 49.92 to 53.33 feet bgs on November 5, 2004. Calculated groundwater elevations varied from 16.70 to 18.36 feet above MSL. The groundwater gradient was approximately 0.008 vertical feet per horizontal foot (ft/ft), with the groundwater flow direction to the east-northeast (SECOR, 2005a).

Site Assessment History

The Site operated as a Chevron and/or Standard Oil Company fuel service station from as early as 1955 until 1996. Five steel underground storage tanks (USTs) and associated product piping were removed in October 1996. Four of the USTs were reportedly used to store gasoline and the remaining UST was used to store waste oil. Soil samples collected from the USTs and product piping excavations by Alton Geoscience (Alton) had reported concentrations of TPHg, total petroleum hydrocarbons as diesel (TPHd), and TRPH as high as 15,000 milligrams per kilogram (mg/kg), 2,800 mg/kg, and 1,500 mg/kg, respectively. Based on laboratory review of the chromatograms for some of the samples, the fuel TPHd was interpreted to be weathered gasoline rather than diesel, and Alton concluded that diesel was not a contaminant of concern at the Site (Alton, 1997a).

Between 1997 and 1999, Alton drilled and sampled 25 soil or well borings at the Site to evaluate the extent of the fuel hydrocarbon impacts to subsurface soil and groundwater. Twelve of the borings were completed as groundwater monitoring wells (MWs) B-1/MW-1, B-3/MW-2, B-4/MW-3, and MW-4 through MW-12 (Alton 1997b). Three of the well borings were completed as nested vapor extraction (VE) wells with two well casings each (B-10/VW-1, B-11/VW-2, and B-12/VW-3). The remaining ten borings were not completed as wells and were backfilled with bentonite grout (B-2, B-5 through B-9, and B-13 through B-16) (SECOR, 2005b).

In September 1997, Alton conducted a soil gas survey and risk assessment at the Site. Thirty soil gas samples were collected at depths of 5 feet bgs, 10 feet bgs, and 15 feet bgs at 10 locations on the Site. Benzene concentrations up to 148 micrograms per liter (µg/L) were measured in the soil vapor samples. In general, the highest concentrations were measured in samples collected in the vicinity of the USTs. A receptor-pathway survey indicated that the receptor-pathway was human inhalation of petroleum-impacted vapors from subsurface soils and groundwater. To evaluate the risk for inhalation of subsurface vapors, Alton used the conservative vapor-phase migration algorithms presented in the 1997 SAM Manual, and conservative risk algorithms presented in United States Environmental Protection Agency (EPA) guidance documents. The results of the risk assessment models estimated that there was no significant risk to public health and safety from vapor-phase benzene (less than 10⁻⁶ excess lifetime cancer risk) (Alton, 1998).

Groundwater monitoring and sampling has been conducted at the Site since 1997. Quarterly groundwater monitoring and sampling have continued at the Site until the present. Light non-aqueous phase liquids (LNAPL) have been identified in wells MW-1 and MW-9 as a measurable apparent thickness or as sheen since September 1999. Dissolved hydrocarbon constituents that have historically been detected in the Site wells include TPHg, BTEX, MtBE; di-isopropyl ether (DIPE), and tert-butanol (TBA).

Extent of Hydrocarbon Impact to Soil

Geologic Cross Section C-C' (Figures 3 & 6) illustrates that soil samples collected from B-1/MW-1 at 5-foot intervals from 15 feet bgs to 65 feet bgs contained TPHg concentrations ranging from 70 mg/kg to 28,000 mg/kg. Below the water table, TPHg concentrations decreased from 9,100 mg/kg (55 feet bgs) to 3,400 mg/kg (60 feet bgs) to 70 mg/kg (65 feet bgs), indicating that hydrocarbon impacts consistently decrease with depth below the groundwater table. Soil samples collected from borings B-11/VW-2 and B-12/VW-3 indicate that hydrocarbon impacts to soil do not extend east or west of the former USTs.

Geologic Cross Sections A-A', B-B', and D-D' (Figures 4, 5, & 7, respectively) illustrate that hydrocarbon impacts to soil are limited to depths below the water table north (cross-gradient) and northeast (downgradient) of the former USTs. The TPHg concentrations in cross-gradient boring B-2 (16,000 mg/kg at 55 feet bgs and <1.0 mg/kg at 60 feet bgs) and in down-gradient boring B-3/MW-2 (2,200 mg/kg at 60 feet bgs and 180 mg/kg at 65 feet bgs) further confirm that hydrocarbon impacts to soil decrease with depth below the groundwater table, indicating that additional assessment is not required below 65 feet bgs.

Geologic Cross Sections A-A', B-B', and D-D' (Figures 4, 5, & 7, respectively) also indicate that hydrocarbon impacts to soil are present in a relatively narrow plume that extends northeast from the former USTs below groundwater. Although soil samples were not collected at depths below 51 feet bgs in boring MW-10, the decreasing trend in hydrocarbon concentrations in soil from B-1/MW-1 to

B-3/MW-2, the lack of detectable hydrocarbon concentrations in well MW-6 at a depth of 62 feet bgs, and the absence of dissolved hydrocarbon constituents in well MW-10 suggest that the extent of hydrocarbon impacts to soil have been adequately assessed.

Soil Vapor Extraction Remediation

The SVE system is connected to six VE wells, three of which are nested, dual-completion wells with shallow and deep screened sections. Vapors from the soil are extracted and treated by a catalytic oxidizer (catox) system. SECOR installed a 100 standard cubic feet per minute (scfm) King Buck/Hasstech Model MMC-5AT SVE/catalytic oxidizer unit at the Site in September 2002.

Approximately 6,278 pounds of hydrocarbons have been removed by the AS/SVE since system startup in 2002. SVE system process hydrocarbon vapor concentrations have reached asymptotically low concentrations. Additionally, based on review of the Fourth Quarter 2004 groundwater remediation status report, dissolved benzene and MtBE concentrations in groundwater have decreased to levels near State of California primary drinking water maximum contaminant levels (MCLs), except proximal to MW-9, MW-7, and MW-1. The plume is stable and decreasing and in a non-beneficial use area. Therefore, it appears that the groundwater remediation goals for the Site have been sufficiently met to allow the remediation system to be decommissioned (SECOR, 2005b).

SCOPE OF WORK

Site assessment methods employed are in accordance with the guidelines set by the DEH (SAM Manual, 2004), the RWQCB, and the Underground Storage Tank Regulations contained in the California Code of Regulations, Title 23. SECOR proposes to implement the following scope of work in general accordance with applicable LWQD guidelines.

Task 1 - Prepare Health & Safety Plan

SECOR will prepare a Site-specific Health and Safety Plan (HASP) to address potential hazards that might be encountered during the proposed verification borings, to be used by SECOR and subcontractors as required by the Occupational Health and Safety Administration (OSHA) Standard "Hazardous Waste Operations and Emergency Response" guidelines (29 Code of Federal Regulations Section 1910.120), and by California Occupational Health and Safety Administration (Cal-OSHA) "Hazardous Waste Operations and Emergency Response" guidelines (California Code of Regulations Title 8, Section 5192). Field staff and contractors will review the HASP before beginning field operations at the Site. The HASP and health and safety program will follow the guidelines of the Chevron Loss Prevention System (LPS).

Task 2 - Perform Utility Search and Locate Underground Utilities

SECOR will contact Underground Service Alert (USA) to determine what utility lines run onto the subject property. Prior to the work described below, a private electromagnetic survey company also will be subcontracted to assess the proposed locations for underground utilities.

Task 3 - Secure Permits for Boring Installation

SECOR will prepare a permit application for the drilling of five verification borings. The drilling permit will be submitted to the DEH for its approval.

Task 4 - Drill and Sample Verification Borings

SECOR will provide a drilling contractor to drill five borings using a drill rig equipped with 8- and 10-inch outside diameter, continuous-flight, hollow-stem augers. All borings will be drilled to a depth of approximately 65 feet bgs. Three borings will be sited in the former tank pit vicinity, and two borings will be in the former dispenser island vicinity. Figure 2 illustrates the proposed locations of the five soil borings CB-1-P through CB-5-P.

A SECOR field geologist will be present to supervise the drilling operations, log the borings, and collect soil samples for chemical testing. Soil samples from the borings generally will be collected at 5-foot depth intervals, as well as at any changes in lithology and at the capillary fringe (i.e., within the soil/groundwater interface) using a split-barrel sampler. The barrel of the sampler will be equipped with multiple brass or steel sample retainers. The shoe of the sampler will be fitted with a spring catcher, if necessary.

Drilling and sampling equipment will be thoroughly decontaminated between sample intervals to minimize the possibility of cross-contamination. Retrieved subsurface soil samples will be monitored for evidence of contamination during drilling using a portable Organic Vapor Analyzer (OVA), which is a flame-ionizing detector. Soil samples will be sealed immediately in brass (or steel) sample rings, sealed with TeflonTM tape and plastic caps, labeled, and placed in a chilled cooler.

Task 5 - Soil Sample Analytical Testing

All soil samples selected for chemical analysis will be delivered under proper chain-of-custody protocol to a State-certified analytical testing laboratory. Soil samples collected will be analyzed for TPHg by CA DHS LUFT Method. The soil sample from the boring with the highest detected TPHg concentration additionally will be analyzed, using U.S. Environmental Protection Agency (EPA) Method 8260B for TRPH, BTEX, MtBE, and for other fuel oxygenates, which include TBA, DIPE, ethyl tert-butyl ether (EtBE), and tert-amyl methyl ether (TAME).

Task 6 - Soil Disposal

Soil cuttings produced during drilling will be containerized in labeled U.S. Department of Transportation (DOT)-approved steel 55-gallon drums. The drums will be stored temporarily on-site in a centralized location, pending receipt of analytical results and determination of appropriate waste disposition.

Task 7 - Reporting

A summary report will be prepared following completion of the confirmation borings and receipt of laboratory analytical results. The report will include field procedures, boring logs, site and soil distribution maps, laboratory analytical results with chain-of-custody records, and an evaluation of the remedial system effectiveness and subsequent site closure.

Scheduling

SECOR will obtain permits and schedule drilling activities following SAM approval of this work plan.

If you have any questions or comments, please call the undersigned at (619) 296-6195.

Sincerely,

SECOR International Incorporated

Kelsi S. Nelson

Project Engineer

Project Manager

Clifford R. Pollock, CHG #514

Principal Engineering Geologist

Attachments: References

Figure 1 - Site Location Map

Figure 2 - Site Plan with Proposed Confirmation Boring Locations

Figure 3 – Site Plan with Cross Section Locations

Figure 4 – Geologic Cross Section A-A' Figure 5 - Geologic Cross Section B-B' Figure 6 - Geologic Cross Section C-C' Figure 7 – Geologic Cross Section D-D'

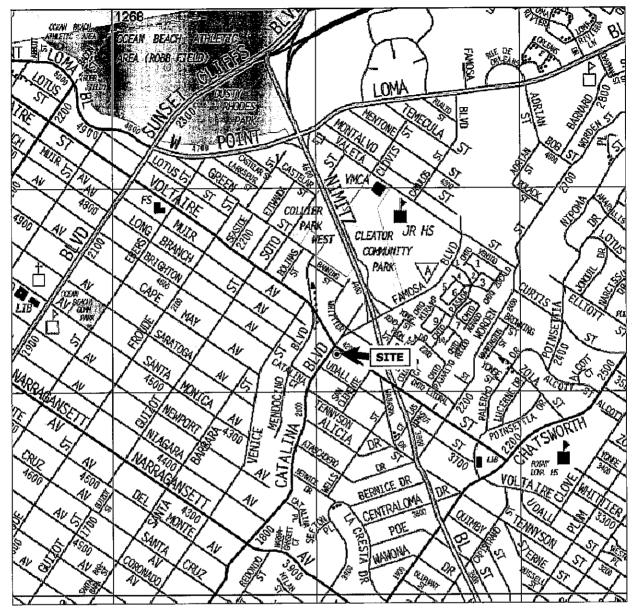
Attachment 1 – SAM Response Letter, May 11, 2005

cc: Mr. Eric Roehl, Chevron Environmental Management Company

REFERENCES

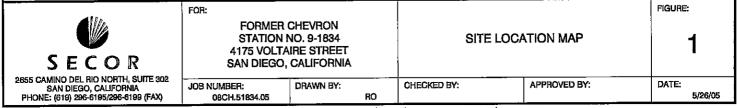
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- Alton Geoscience, 1997b. Initial Site Assessment, Chevron Station #9-1834, 4185 Voltaire Street, San Diego, California, June 26, 1997.
- Alton Geoscience, 1998. Soil Gas Survey and Risk Assessment, Chevron Station #9-1834, 4185 Voltaire Street, San Diego, California, January 14, 1998.
- California Regional Water Quality Control Board, San Diego Region, 1994. Water Quality Control Plan for the San Diego Basin (9). September, 1994.
- County of San Diego, Department of Environmental Health, Site Assessment and Mitigation (SAM) Program, 2004, 2004 SAM Manual.
- Kennedy, M.P. and G.L. Peterson, 1975 (Reprint 2001). *Geology of the San Diego Metropolitan Area, California*: California Division of Mines and Geology <u>Bulletin 200</u>.
- San Diego County Water Authority (SDCWA), 1996. Groundwater Basin Map, Hydrologic Planning Units, SDCWA Water Resources Department.
- SECOR International Incorporated, 2005a. ChevronTexaco Third & Fourth Quarter 2004 Groundwater Monitoring Report, Former Chevron Service Station #9-1834, 4175 Voltaire Street, San Diego, California, February 16, 2005.
- SECOR International Incorporated, 2005b. Corrective Action Plan, Former Chevron Service Station #9-1834, 4175 Voltaire Street, San Diego, California, April 25, 2005.
- U.S. Geologic Survey, 1967 (photorevised 1975, with minor revisions in 1994), La Jolla, California 7.5-Minute Quadrangle Topographic Map, Scale 1"=2,000'.

FIGURES



REFERENCE: THOMAS GUIDE CD-ROM, PAGE & GRID 1268 B6.





COMMERCIAL **VOLTAIRE STREET** ♠ MW-10 FORMER DISPENSER ISLANDS CB-1-P 7--11 MW-2 ⊕ NW-6 CATALINA BOULEVARD MW-5 😷 MW-11 💮 COMMERCIAL/RESIDENTIAL MW-3 @ CB-2-P T PRIME MARKET MW-7 **PARKING** 0 LOT LIQUOR STORE **FORMER** SITE BUILDING MW-4 B-12/VW-3 FORMER: USED OIL CB-3-P MW-9 W-2 @ CB-5-P MW-8 MW-12 FÖRMER UNDERGROUND **ALLEY** STORAGE TANKS LEGEND: MW-1 D MONITORING WELL **NESTED VAPOR EXTRACTION WELL** 40 80 CB-1-P --PROPOSED CONFIRMATION BORING LOCATION APPROXIMATE SCALE (FEET) PREPARED FOR: FIGURE: FORMER CHEVRON SITE PLAN WITH PROPOSED **STATION NO. 9-1834** CONFIRMATION BORING LOCATIONS 4175 VOLTAIRE STREET SECOR SAN DIEGO, CALIFORNÍA 2655 CAMINO DEL RIO NORTH, SUITE 302

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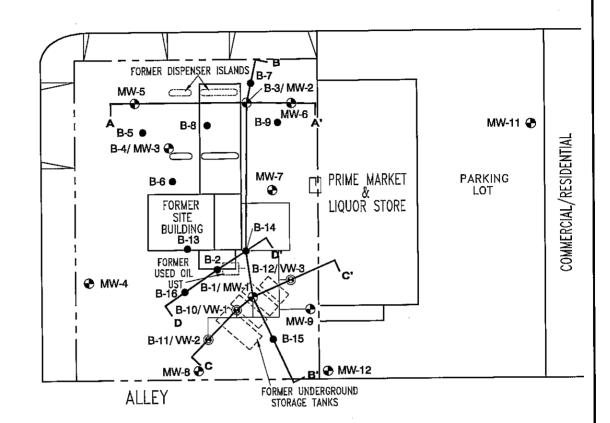
SAN DIEGO, CALIFORNIA PHONE: (618) 296-6195/296-6199 (FAX)

VOLTAIRE STREET

♠ MW-10

. . .

7-11



LEGEND:

MW-1 The MONITORING WELL

VE-1

NESTED VAPOR EXTRACTION WELL

B-1 • SOIL BOREHOLE

A A' I CROSS-SECTION LINE 0 40 80

APPROXIMATE SCALE (FEET)



PREPARED FOR:

FORMER CHEVRON
STATION NO. 9-1834
4175 VOLTAIRE STREET
SAN DIEGO, CALIFORNIA

SITE PLAN WITH GEOLOGIC CROSS SECTION LOCATIONS

3

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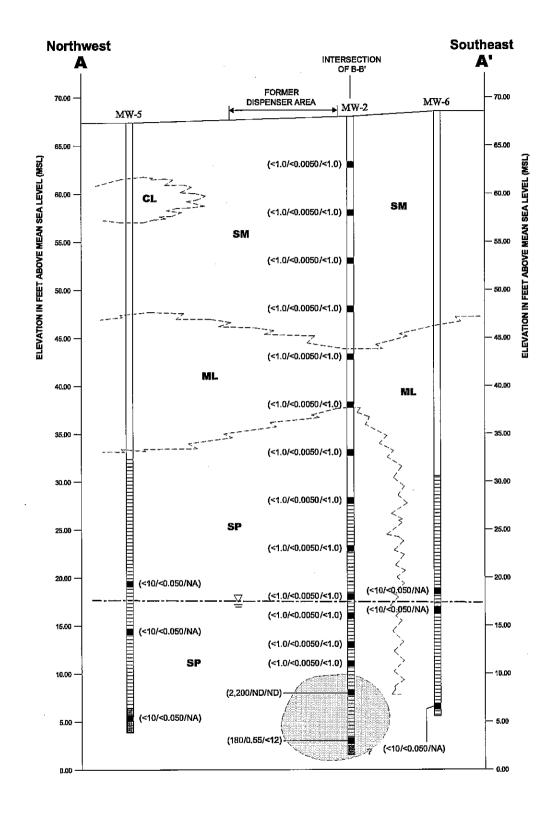
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LEGEND: MW-15 BORING/WELL IDENTIFICATION CL CLAY ML SILT -INDICATES BACKFILLED BOREHOLE SW WELL GRADED SAND -BLANK PVC CASING INTERVAL SP POORLY GRADED SAND SM SILTY SAND -SCREEENED PVC WELL INTERVAL SOIL SAMPLE LOCATION WITH TOTAL PETROLEUM HYDROCARBONS AS GASOLINE (TPHg), BENZENE, AND METHYL TERT-BUTYL ETHER (MTBE) CONCENTRATIONS MEASURED IN MILLIGRAMS PER KILOGRAM (mg/kg). (<10/<0.050/NA) NA NOT ANALYZED ND NOT DETECTED, LESS THAN LABORATORY REPORTING LIMIT < LESS THAN REPORTING LIMIT INDICATED ---- INFERRED SOIL CONTACT --- APPROXIMATE DEPTH TO GROUNDWATER HORIZONTAL SCALE IN FEET ESTIMATED EXTENT OF RESIDUAL PETROLEUM HYDROCARBONS IN SOIL (TPHg ≥100mg/kg) VERTICAL SCALE IN FEET FIGURE: PREPARED FOR:

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JOB NUMBER:

SECOR

2655 CAMINO DEL RIO NORTH, SUITE 302 SAN DIEGO, CALIFORNIA PHONE: (619) 296-6195/296-6199 (FAX) FORMER CHEVRON

STATION NO. 9-1834 4175 VOLTAIRE STREET

SAN DIEGO, CALIFORNIA

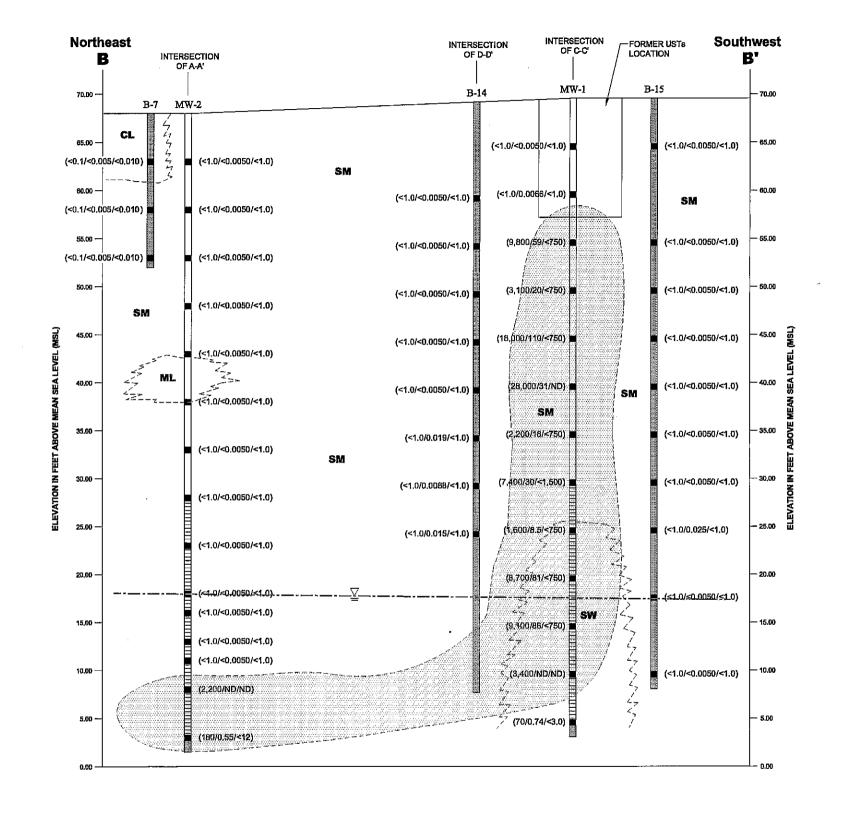
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GEOLOGIC CROSS SECTION A-A'

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LEGEND: CL CLAY MW-15 BORING/WELL IDENTIFICATION ML SILT -INDICATES BACKFILLED BOREHOLE SW WELL GRADED SAND SP POORLY GRADED SAND -BLANK PVC CASING INTERVAL SM SILTY SAND -SCREEENED PVC WELL INTERVAL (<10/<0.050/NA) SOIL SAMPLE LOCATION WITH TOTAL PETROLEUM HYDROCARBONS AS GASOLINE (TPHg), BENZENE, AND METHYL TERT-BUTYL ETHER (MTBE) CONCENTRATIONS MEASURED IN MILLIGRAMS PER KILOGRAM (mg/kg). NA NOT ANALYZED NO NOT DETECTED, LESS THAN LABORATORY REPORTING LIMIT < LESS THAN REPORTING LIMIT INDICATED ---- INFERRED SOIL CONTACT — - — APPROXIMATE DEPTH TO GROUNDWATER ESTIMATED EXTENT OF RESIDUAL PETROLEUM HYDROCARBONS IN SOIL (TPHg ≥100mg/kg) HORIZONTAL SCALE IN FEET



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STATION NO. 9-1834
4175 VOLTAIRE STREET
SAN DIEGO, CALIFORNIA

GEOLOGIC CROSS SECTION B-B'

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FIGURE:

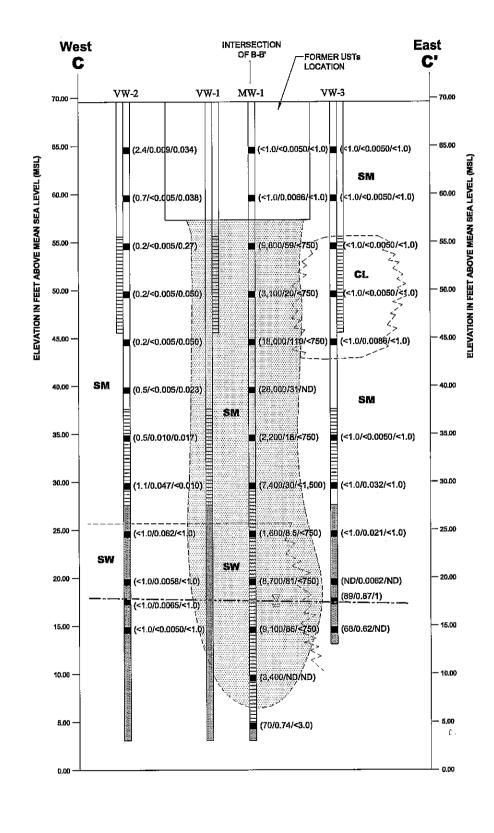
VERTICAL SCALE IN FEET

40

PHONE: (619) 296-6195/296-6199 (FAX) 09CH.41834.05 RO/PD |
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LEGEND: CL CLAY MW-15 BORING/WELL IDENTIFICATION SW WELL GRADED SAND -INDICATES BACKFILLED BOREHOLE SP POORLY GRADED SAND SM SILTY SAND -BLANK PVC CASING INTERVAL -SCREEENED PVC WELL INTERVAL SOIL SAMPLE LOCATION WITH TOTAL PETROLEUM HYDROCARBONS AS GASOLINE (TPHg), BENZENE, AND METHYL TERT-BUTYL ETHER (MTBE) CONCENTRATIONS MEASURED IN MILLIGRAMS PER KILOGRAM (mg/kg). (<10/<0.050/NA) ND NOT DETECTED, LESS THAN LABORATORY REPORTING LIMIT < LESS THAN REPORTING LIMIT INDICATED ----- INFERRED SOIL CONTACT APPROXIMATE DEPTH TO GROUNDWATER ESTIMATED EXTENT OF RESIDUAL PETROLEUM HYDROCARBONS IN SOIL (TPHg ≥100mg/kg) HORIZONTAL SCALE IN FEET VERTICAL SCALE IN FEET

JOB NUMBER:

FORMER CHEVRON

STATION NO. 9-1834 4175 VOLTAIRE STREET

SAN DIEGO, CALIFORNIA

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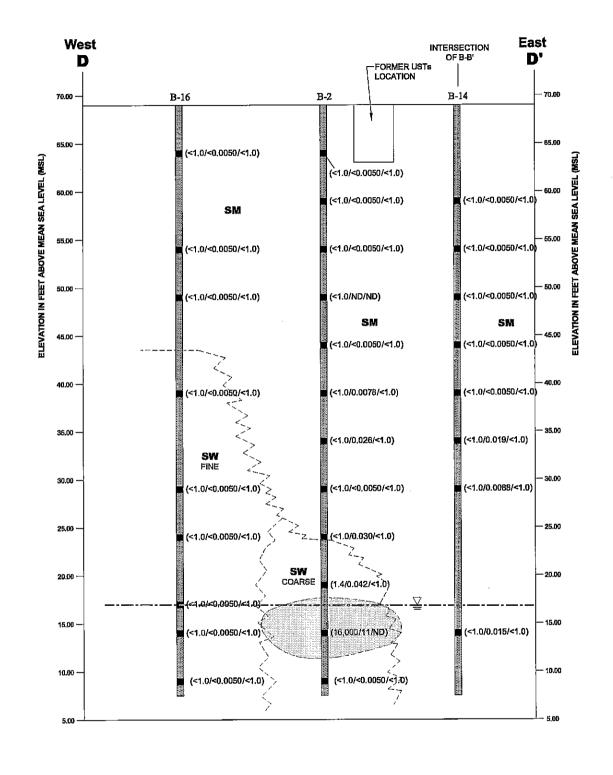
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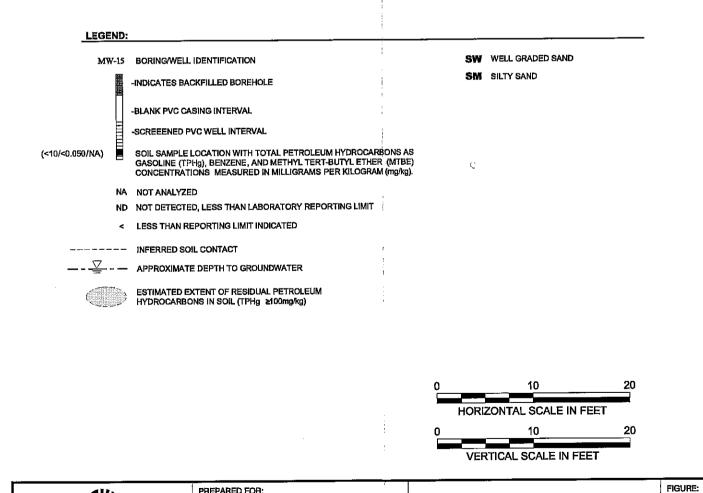
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GEOLOGIC CROSS SECTION C-C'

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FORMER CHEVRON

PREPARED FOR:

ATTACHMENT



County of San Diego

SECOR INTERNATIONAL

PECEIVET

MAY 1 6 2005

CONTRACTOR OF STREET

GARY W. ERBECK DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH LAND AND WATER QUALITY DIVISION

P.O. BOX 129261, SAN DIEGO, CA 92112-9261 619-338-2222/FAX 619-338-2315/1-800-253-9933

www.sdcounty.ca.gov/deh/lwq

RICHARD HAAS . ASSISTANT DIRECTOR

May 11, 2005

Mr. Eric Roehl SAR Project Manager Chevron Products Company P.O. Box 2292 Brea, CA 92822-2292

Dear Mr. Roehl:

UNAUTHORIZED RELEASE #H12455-002 RESPONSE LETTER CHEVRON STATION NO. 9-1834 4175 VOLTAIRE STREET, SAN DIEGO, CA

Staff of the Department of Environmental Health (DEH) has reviewed the report titled *Notice of Remediation System Shut-Down and Site Closure Evaluation*, prepared by SECOR, dated March 7, 2005.

DEH concurs that the SVE system at the Site can be shut down while groundwater monitoring occurs. However, at least 2 groundwater monitoring events must be conducted.

In addition, according to the April 11, 2002 Work Plan for Interim Remediation, submitted by SECOR to DEH, confirmation borings will be installed while the SVE system is shut down.

You are required to submit a workplan to DEH detailing the above-mentioned activities within 60 days of receipt of this letter.

If you have any questions or need additional information, please feel free to call me at (619) 338-2243.

Sincerely,

KENT HUTH, Project Manager

West Hesty

Site Assessment and Mitigation Program

KH:kd

cc: Kim Thompson, SECOR

WP/H12455-002-505POPRL